

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

In re:

WORLD HEALTH JETS LLC

Debtor

CASE NO. 16-00296-NPO
Chapter 11

**MOTION OF WORLD HEALTH JETS LLC
FOR ORDER DIRECTING JOINT ADMINISTRATION
OF AFFILIATED CASES PURSUANT TO BANKRUPTCY RULE 1015(B)**

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, 11 U.S.C. § 105(a) and other applicable sections of the United States Bankruptcy Code. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

BACKGROUND

2. On February 2, 2016 (the “*Petition Date*”), the Debtor filed its voluntary petition for relief and thereby commenced its bankruptcy case under chapter 11, title 11 of the United States Code (the “*Bankruptcy Code*”), in the United States Bankruptcy Court for the Southern District of Mississippi (the “*Court*”).

3. Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor is operating the business and managing the properties as Debtor-in-possession.

4. No trustee or examiner has been appointed, and no official committee of unsecured creditors has been established at this time.

5. The Debtor is a Mississippi limited liability company with its principal place of business located at 350 West Woodrow Wilson Avenue, #132, Jackson, Mississippi. The Debtor is an asset holding company consisting of one (1) 2013 Embraer EMB-500 Phenom 100.

6. On February 2, 2016, the following related entities also filed a voluntary petition for relief and thereby commenced its bankruptcy case under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Mississippi:

<u>Debtor’s Name</u>	<u>Case Number</u>
Opus Management	Case No. 16-00297-NPO (“ <i>Opus Management Case</i> ”)
McDaniel Pharmacy	Case No. 16-00288-NPO (“ <i>McDaniel Pharmacy Case</i> ”)
OpusRx	Case No. 16-00291-NPO (“ <i>OpusRx Case</i> ”)
Vitality	Case No. 16-00292-NPO (“ <i>Vitality Case</i> ”)

Hallandale
CareRx
WHJ

Case No. 16-00294-NPO (“*Hallandale Case*”)
Case No. 16-00295-NPO (“*CareRx Case*”)
Case No. 16-00296-NPO (“*WHJ Case*”)

RELIEF REQUESTED

7. The Debtor has filed this Motion seeking to procedurally consolidate the Lead Case, the McDaniel Pharmacy Case, the OpusRx Case, the Vitality Case, the Hallandale Case, the Care Rx Case, and the WHJ Case for administrative purposes only. The Debtor is not seeking to substantively consolidate these cases at this time.

8. Five of the debtor-entities (McDaniel Pharmacy, OpusRx, Vitality, Hallandale, and Care Rx) operate retail pharmacies and also serve as compounding pharmacies. WHJ is an asset holding company, which holds title to a 2013 Embraer EMB-500 Phenom 100 aircraft used in the related businesses, and Opus Management provides management and administrative services for the other six entities, as well as certain non-debtor entities.

9. The Debtors believe that chapter 11 is the mechanism by which the Debtors will best be able to maintain the going concern value of their businesses, obtain necessary financing to address their immediate liquidity concerns, and preserve their existing customer and business relationships for the benefit of the bankruptcy estate, their creditors and other interested parties.

10. Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”) authorizes joint administration of separate cases when filed by affiliated debtors. The Debtors constitute “affiliates” as the term is defined in Section 101(2) of the Bankruptcy Code due to the fact that, Opus Management manages and provides administrative services for the five pharmacy debtors, as well as providing other administrative services for WHJ and other non-pharmacy entities.

11. The Debtors' business operations, structure, financing, and purpose are closely related. All of the administrative and management services necessary to oversee the operations of the Debtors are provided by the Debtor and its management.

12. As a result of the nature of the relationships of the Debtors, their common operating structure and the management and administrative structure, the Debtor believes that a joint administration pursuant to Bankruptcy Rule 1015(b) of the Opus Management Case, the McDaniel Pharmacy Case, the OpusRx Case, the Vitality Case, the Hallandale Case, the Care Rx Case, and the WHJ Case would produce administrative efficiencies and a substantial reduction in administrative expenses which would benefit the interests of all concerned – the bankruptcy estates, the creditors, and all interested parties, particularly with respect to functions such as filing pleadings and noticing hearings. Furthermore, the Court and the Clerk would similarly benefit from the judicial economy resulting that a joint administration because of: (a) a single consolidated scheduling and noticing process; (b) elimination of duplicative pleadings by having a single pleading filed related to all cases; (c) a lessened probability of pleading being misfiled in the incorrect bankruptcy case, and; (d) an overall simplification in the administration of these bankruptcy cases.

13. The Debtor suggests that, upon entry of an Order granting this Motion, all documents filed in the Opus Management Case as the Lead Case, the McDaniel Pharmacy Case, the OpusRx Case, the Vitality Case, the Hallandale Case, the Care Rx Case, and the WHJ Case should be filed with the following caption:

18. Notice and Service of this Motion will be provided to all parties listed on **Exhibit A** attached hereto, which is the collective service list for the Twenty Largest Unsecured Creditors for each of the seven (7) debtors. The Debtor submits that such notice and service are sufficient under the circumstances.

WHEREFORE, the Debtor requests that the Court enter an Order directing joint administration of the Lead Case, the McDaniel Pharmacy Case, the OpusRx Case, the Vitality Case, the Hallandale Case, the Care Rx Case, and the WHJ Case under the case number of the Lead Case, *Opus Management Group Jackson, LLC, et al.* and that all documents to be filed thereafter be captioned as set forth above. The Debtor requests such other relief that the Court deems necessary and just.

THIS, the 9th day of February 2016.

Respectfully submitted,

WORLD HEALTH JETS LLC

By: /s/ Thomas M. Hewitt

Stephen W. Rosenblatt (Miss. Bar No. 5676)
Christopher R. Maddux (Miss. Bar No. 100501)
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ATTORNEYS FOR THE DEBTOR

CERTIFICATE OF SERVICE

I certify that the foregoing pleading was filed electronically through the Court's ECF system and served electronically on all parties enlisted to receive service electronically and was separately served by e-mail on the following:

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The Creditors identified on the attached **Exhibit A** hereto.

SO CERTIFIED, this the 9th day of February 2016.

/s/ Thomas M. Hewitt
THOMAS M. HEWITT

Exhibit A

29766098v1

Label Matrix for local noticing
0538-3
Case 16-00296-NPO
Southern District of Mississippi
Jackson-3 Divisional Office
Tue Feb 9 10:52:07 CST 2016

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

INTERNAL REVENUE SERVICE
PO BOX 21126
PHILADELPHIA, PA 19114

MS STATE TAX COMMISSION
BANKRUPTCY SECTION
PO BOX 23338
JACKSON, MS 39225

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)World Health Jets LLC
350 W. Woodrow Wilson
#132
Jackson, MS 39213-7681

End of Label Matrix	
Mailable recipients	30
Bypassed recipients	1
Total	31